

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

JOSHUA SMITH, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

PEPSICO, INC.,

Defendant.

Case No. 3:22cv184

FED. R. CIV. P. 23 Class Action

**NOTICE OF FILING NOTICE OF CONSENT TO JOIN**

Plaintiff, JOSHUA SMITH, gives notice of filing the attached Notice of  
Consent to Join.

Dated this 5<sup>th</sup> day of April, 2022.

**/s/ TARA TIGHE**

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*Counsel for the Plaintiff(s)*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the above and foregoing Notice of Filing Notice of Consent to Join of Plaintiff, Joshua Smith, has been served along with the Summons and a copy of the Complaint.

**/s/ TARA TIGHE**

Tara Tighe, Esq.

**EXHIBIT “A”**

**CONSENT TO JOIN WAGE CLAIM**Print Name: Joshua A Smith

1. I consent to join the collective action lawsuit filed against **PepsiCo, Inc., Gatorade**, and any affiliated persons or entities to pursue my claims of unpaid overtime and related damages during the time that I worked with them.
2. I understand that these claims are brought under the Fair Labor Standards Act and applicable federal and state law.
3. I consent to be bound by the Court's decisions.
4. I designate the representative plaintiff named in the lawsuit and/or appointed by the Court as my agent to make decisions on my behalf regarding the lawsuit, including entering into settlement agreements, agreements with counsel, and all other matters related to the lawsuit.
5. I designate the law firm PARMET PC as my attorneys to prosecute my wage claims.
6. I understand and agree that my attorneys, the representative plaintiff, or the Court may in the future appoint other individuals to be representative plaintiff. I consent to the appointment and agree to be bound by the decisions made by the representative plaintiff regarding this matter. I understand that I may be selected or appointed to serve as a representative plaintiff.
7. If needed, I authorize this consent to be used to re-file my claim in a separate lawsuit or arbitration.

DocuSigned by:  
Joshua Smith  
Signature

3/26/2022  
Date

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**Ex. 1**